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November 15, 2021

VIA ECF

Hon. Judge Nicholas G. Garaufis
United States District Court
Eastern District of New York
100 Federal Plaza
Central Islip, New York 11722

Re: Ortega v. Yagudaev, et al.
Case No. 1:21-cv-01125-NGG-CLP

Dear Judge Garaufis,

As this court is already aware, the undersigned represents Plaintiff Iluminada Ortega ("Plaintiff") in the above-referenced action. The parties write jointly in response to this Court's Order dated November 2, 2021, directing Plaintiff to file its Amended Complaint by November 16, 2021.

The undersigned had met and conferred with counsel for Defendant Champagne Room BK, Inc., and is thus requesting a brief extension of up until November 23, 2021, for Plaintiff to file its Amended Complaint and up until December 7, 2021 for Defendant Champagne Room BK, Inc., to file its responsive pleading. This is Plaintiff first request as Plaintiff has not previously requested any extension to file an Amended Complaint. The parties have yet to confer and propose a motion schedule, yet, plan to do so upon the filing of Plaintiff's Amended Complaint.

The undersigned thanks this Honorable Court its time and attention to this case.

Respectfully submitted,

By: /s/Jonathan Shalom
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